

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW HAMPSHIRE**

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Laurie Ortolano,	:	
	:	
Plaintiff	:	
	:	
v.	:	1:22-cv-00326-LM
	:	
	:	
The City of Nashua, New Hampshire, et al.	:	
Defendants	:	

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**JOINT RENEWED MOTION TO CONTINUE WITH  
A PROPOSED SCHEDULE FOR DEADLINES**

Plaintiff Laurie Ortolano respectfully files this Joint Renewed Motion to Continue with a Proposed Schedule for Deadlines as suggested by the Court. In support of this motion, Plaintiff states the following.

1. The parties filed an Assented-To Motion to Extend Case Deadlines [Doc. No. 59] on September 18, 2023.
2. As part of its Order granting Donchess's and Griffin's Motion for Judgment on the Pleadings [Doc. No. 61], the Court denied the parties' Motion to Extend Deadlines on September 28<sup>th</sup> but stated, "[T]he parties may file a renewed motion to continue with a proposed schedule." [Doc. No. 61, p. 28]
3. The parties agreed to the proposed schedule during a conference call, and counsel have advised their clients of the request to extend the trial deadline.
4. Attached to this Motion is the parties' proposed schedule for deadlines.

WHEREFORE, all parties respectfully requests that this Court:

- A. Allow the Joint Renewed Motion to Continue with a Proposed Schedule for Deadlines.

B. Grant such further relief as justice requires.

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### **PROOF OF SERVICE**

I hereby certify that I served a copy of this **JOINT RENEWED MOTION TO CONTINUE WITH A PROPOSED SCHEDULE FOR DEADLINES** by CM/ECF on this 25th day of October 2023, on all counsel or parties of record.

By: /s/ Kurt S. Olson  
Kurt S. Olson